



Department of Energy

Field Office, Oak Ridge
P.O. Box 2001
Oak Ridge, Tennessee 37831— 8542

January 14, 1993

Mr. A. S. Quist
International Technology
Martin Marietta Energy Systems, Inc.
P. O. Box 2003
Oak Ridge, Tennessee 37831-7307

Dear Mr. Quist:

DOCUMENT RELEASE

The Department of Energy K-25 Site Office reviewed the enclosed documents and has determined that they are fully releasable to ChemRisk and the State of Tennessee for official use.

Sincerely,


Thomas S. Tison
K-25 Site Manager

Enclosures:

1. OR-890, dtd. 5/88 .
2. Gross to Heiskell, dtd. 12/4/90
3. Hall to Heiskell, dtd. 4/17/91
4. Heiskell to Freeman, dtd. 4/11/91

#243

ChemRisk Repository Number: 243 Document Number: 01198

Title: K-25 Site Corrective Action Plan for Surveillance of Environmental
Incident Reporting

Authors: L. E. Hall

tract: Letter presenting Corrective Action Plans or findings in
surveillance of Environmental Incidents. Provides dates and
identification of environmental incidents, including "off-normal"
events and a fish kill.

Reviewer: G. Bruce

Document Source or Location: K-25 SDRC

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OAK RIDGE HEALTH STUDIES DOCUMENT SUMMARY FORM

#243

DOCUMENT TITLE:

K-25 ~~Cor~~ Site Corrective Action Plan for
Surveillance of Environmental Incident Reporting

DOCUMENT NUMBER OR IDENTIFIER:

01198

AUTHOR(S):

Heiskell, Marianne M. J Hall, L.E.

DATE DOCUMENT ISSUED:

April 17, 1991

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REP. DOC. No: # 243

BY: CMV

KEYWORDS:

violations
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ABSTRACT:

Letter presenting Corrective Action Plans for
findings in surveillance of Environmental Incidents.
Also provides dates and identification of environmental
incidents, including "off-normal" events and a
fish kill.

COPY REQUESTED



REVIEWER:

GMB

DATE REVIEWED: 10/20/92

United States Government

FILE COPY**01198**Y
IS**memorandum**

DATE: December 4, 1990

REPLY TO: SE-31:Marciante

ATTN OF: SE-31:Marciante

SUBJECT: Marianne Heiskell, K-25 Site Manager, K-25 Site Office, DP-85

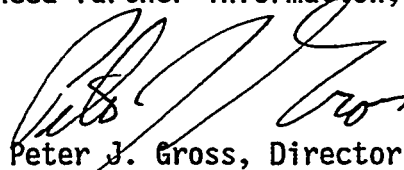
TO: **ENVIRONMENTAL PROTECTION DIVISION (ENVPD) SURVEILLANCE ENVIRONMENTAL INCIDENT REPORTING AT THE OAK RIDGE K-25 PLANT**

This document has been prepared as UNCLASSIFIED. It may or may not have been reviewed for classification. This document and the information contained therein is for INTERNAL USE ONLY by those involved in the K-25 Site Team Assessment and may not be readily removed from K-25 Site or made available without the release approval of the K-25 Site Classification and Information Control Office.

Attached is a report of the surveillance conducted on November 7-8, 1990, of the Oak Ridge K-25 Plant Environmental Incident Reporting Program by Gabe Marciante. Additional information was provided by the plant on November 21, 1990.

Please prepare a corrective action plan within 30 days of receipt of this memo and send a copy to this office to the attention of Gabe Marciante. The identified deficiencies will be tracked in our Deficiency Tracking System Database. The ENVPD does not validate for closure a deficiency until the respective COR notifies the ENVPD that he/she has verified satisfaction of the deficiency by the M&O contractor.

If you have any questions, or need further information, please contact Gabe Marciante at 6-2503.



Peter J. Gross, Director
Environmental Protection Division

Attachment:
Subject Report

cc w/attachment:
Clayton Gist, SE-311
Margaret Wilson, SE-312
Rod Nelson, SE-30
Bill Adams, DP-85
Larry Long, Bldg. 1001, MS-7155
Mike Mitchell, Bldg. 1001, MS-7155
Susan Dyer, SE-31

K-25 SITE OFFICE

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LOG NO.

FILE CODE

5484.3

**ENVIRONMENTAL PROTECTION DIVISION
SURVEILLANCE PROGRAM**

**ENVIRONMENTAL INCIDENT REPORTING
NOVEMBER 7-8, 1990**

1.0 OBJECTIVE

To determine the compliance status of the Oak Ridge K-25 Plant (K-25) with respect to regulatory and DOE Order provisions for environmental incident reporting (EIR). The use of best management practices with respect to the conduct of the EIR program was also evaluated.

2.0 SCOPE

A surveillance of the K-25 EIR Program was conducted on November 7-8, 1990. Procedures were reviewed, interviews conducted, the Plant Shift Superintendent's (PSS's) log book was reviewed for the months of September and October 1990, and a table top drill was conducted around an oil spill event.

3.0 SURVEILLANCE RESULTS

3.1 Proficiencies

- A. The review of the PSS log revealed that a significant number of spills of minor oil and petroleum products to paved areas and the ground were reported to the PSS. This is indicative of a trained and sensitized population of plant workers, pointing to an effective training program. The six minute training video, "Mishap or Mayhem," was pithy and effective in getting its short message across to be sensitive to incidents.
- B. The PSS staff demonstrated a notably organized approach to incident reporting. Personnel were well prepared for the review. The plant has a robust procedure that mirrors the requirements of DOE Order 5000.3A.
- C. The plant uses an electronic mail "hot-mail" system for rapidly disseminating information about an incident. This ensures rapid dissemination of information and allows all plant divisions to engage in a review of their own vulnerabilities.
- D. Even events that are classified as "non-routine" (that is, do not come under the purview of DOE 5000.3A) are considered for review by division management for a "root cause" analysis.

3.2 Deficiencies

- A. EPIR-901108-A: Environmental incidents are not being classified consistent with DOE Order 5000.3A. (Priority II) (DOE 5000.3A)

Supporting Information: Incident numbers K25-90-112 and K25-90-158, both relating to receipt of notices of violation for Resource Conservation and Recovery Act violations, were classified as an "off normal" events. DOE 5000.3A, Attachment I, Page 11 item E.(a), requires that such events be classified as "unusual occurrences." Similarly, event K25-90-142, of October 19, 1990, relating to receipt of a Notice of Violation for Toxic Substance Control Act violations, was not classified as an unusual occurrence. Event K25-90-168, reported on November 4, 1990, relating to an NPDES violation, was not classified as an unusual occurrence after protracted discussion. DOE 5000.3A, Attachment I, Page 10, B.(b), requires that all releases which violate permit requirements be classified as unusual occurrences.

- B. EPIR-901108-B: Unusual occurrence K25-90-168 of November 4, 1990, a fish kill event, was not reported within two hours. (Priority II) (DOE 5000.3A) and (DOE 5484.1, Chapter I,1.(n))

Supporting Information: Event K25-90-168 was reported over four hours after it occurred. It is very important that fish kill events be reported as soon as possible, so that state officials can take appropriate response actions.

- C. EPIR-901108-C: The September 6, 1990, NPDES violation was not reported pursuant to DOE Order 5000.3A. (Priority II) (DOE 5000.3A)

Supporting Information: Because of an oversight, the subject NPDES violation was not reported as an unusual occurrence.

- D. EPIR-90-1108-D: The EIR Program does not have an NQA-1 based quality assurance plan. (Priority II) (DOE 5700.6B)

Supporting Information: DOE Order 5700.6B, "Quality Assurance," establishes the requirements for QA and the NQA-1 program. The development and implementation of NQA-1 will provide assurance that incident reports are prepared and issued as required. The plant recognizes this deficiency and plans to remedy it.

- E. EPIR-90-1108-E: An internal self-assessment mechanism for the EIR function has not been fully developed and implemented. (Priority II) (DOE Order 5482.1B.9d)

Supporting Information: DOE Order 5482.1B, "Environmental, Safety and Health Program," requires the contractor to conduct auditable internal appraisals at the operating level to provide an objective and independent review of the ES&H functions. The internal appraisal function is an important tool that can be used to identify and correct program and facility deficiencies. While the K-25 Plant recognizes the need for this tool, an internal appraisal mechanism has not been fully developed and implemented.

- F. EPIR-90-1108-F: K-25 has not performed a compliance assessment relative to the reporting to the National Response Center of non-Federally permitted continuous releases of hazardous substances that exceed the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) reportable quantity limits over 24 hours. (Priority II) (40 CFR 302.6(a))

Supporting Information: At 40 CFR 302.6(a), any person in charge of a facility is required to notify the National Response Center immediately of any non-Federally permitted continuous releases of hazardous substance that exceed the CERCLA reportable quantities limits over 24 hours. Headquarters DOE and the Environmental Protection Agency (EPA) have counseled ORO to perform such compliance assessments.

- G. EPIR-90-1108-G: The K-25 Plant has not made appropriate follow-up written notifications to the Local Emergency Planning Committees (LEPCs). (Priority II) (40 CFR 355.40)

Supporting Information: The regulations at 40 CFR 355.40 require the owner or operator of a facility to immediately notify and provide a written follow-up notice to the local emergency planning committees of any area affected by the release of a reportable quantity of any CERCLA hazardous substance or any Emergency Planning and Community Right To Know Act (EPCRA) extremely hazardous substance. Since January 1, 1990, the K-25 Plant has been involved with two instances (February 2 and April 20, 1990) wherein the LEPCs were verbally notified of an environmental incident. To date, the required written follow-up notifications have not been made.

- H. EPIR-90-1108-H: The Spill Prevention Control and Countermeasures Plan (SPCCP) has not been sent to the EPA Regional Administrator and the State of Tennessee. (Priority II) (40 CFR 112.4)

Supporting Information: EPA regulations at 40 CFR 112.4 require the owner or operator of a facility that discharges harmful quantities of oil in two spills within 12 months to submit a complete copy of the SPCC Plan to the Regional Administrator. The K-25 plant had a discharge of oil to waters of the state on August 2, 1989, and February 2, 1990. There is no record that the SPCC Plan was sent to the EPA.

- I. EPIR-90-1108-I: The plant has not proceduralized regulatory reporting requirements. (Priority II) (DOE Order 5700.6B)

Supporting Information: The Environmental Coordinator's office does not have a consolidated book of procedures relating to the regulatory requirements for environmental incident reporting. Incident respondents work primarily from memory and past experience.

M E M O R A N D U M

DATE: 12/18/90

REPLY TO: Doug Reed, EW-92 (6-9520)

SUBJECT: Environmental Protection Division Surveillance - K25 Site

TO: Larry Radcliffe, EW-92

This is to answer a few questions which you had regarding the ENVPD Environmental Incident Reporting Surveillance conducted on November 7-8, 1990 at the Oak Ridge K-25 Site.

Discussion between the K-25 Site Office and the ENVPD began quite a few weeks before the actual surveillance, and resolved around the issues which would be assessed and the method used to evaluate them. I was present during the surveillance, which revolved around the PSS Office and the Environmental Division at K-25. An informal close-out briefing was held at the time of the surveillance, with the option of a formal close-out at the discretion of the site. The Site Office also received a draft of the report before it was issued and had no comments on the report. Due to no issues arising in the draft report which had not been identified during the initial close-out, the formal close-out was not held. Upon formal receipt at the Site Office, the report was forwarded to Energy Systems (ES) for a response. Upon receipt of the response, the Site Office will forward a copy of the report to the ENVPD.

The clause stating a 30 day response time is derived from DOE Orders which allow DOE to request a 30 day turn-around time from the contractor. Prior to the establishment of the Site Offices, the ENVPD sent these letters directly to the contractor. At the request of the Site Office Manager, correspondence from ORO to ES at K-25 is funneled through the Site Office so that the staff is kept informed of ongoing events. Apparently the format of letters from the ENVPD has not changed with the creation of the Site Offices.

Please be assured that the Site Office has kept a watch on this surveillance since it originated. (It was performed as a required surveillance under ENVPD policy.) We are comfortable with the content of the report, and will continue to give it our attention.

If you have any other questions, please call me at 576-9520.

Doug Reed for
Marianne M. Heiskell
Acting K-25 Site Manager

FILE COPY

K-25 SITE CORRECTIVE ACTION PLAN

01198

RTIN MARIETTA ENERGY SYSTEMS, INC.

POST OFFICE BOX 2003
OAK RIDGE, TENNESSEE 37831 - 7134

April 17, 1991

Marianne M. Heiskell
K-25 Site Manager
Department of Energy, Oak Ridge Operations
Post Office Box 2003
Oak Ridge, Tennessee 37831-7136

Dear Ms. Heiskell:

K-25 Site Corrective Action Plan for Surveillance of Environmental Incident Reporting

Reference: Letter, M. M. Heiskell to L. E. Hall, Action Items from Environmental Compliance Reports, dated December 14, 1990

Letter, M. M. Heiskell to L. E. Hall, Surveillance of Environmental Incident Reporting—Corrective Actions, dated February 12, 1991

In response to your letters referenced above, attached is the Corrective Action Plan for each of the findings identified in the subject surveillance. This surveillance was conducted by the Department of Energy Environmental Protection Division during the period of November 7-8, 1990.

The Corrective Action Plan was originally requested by January 4, 1991, and we apologize for this late submission. Please be assured that measures are being taken to preclude this type of oversight on future corrective actions requests.

If you have any questions or require additional information, please contact E. ' the K-25 Site Quality Assurance office at 574-8219.

Sincerely,

L. E. Hall

L. E. Hall, Manager
Oak Ridge K-25 Site

LEH:RWStormer:njb

Attachment

cc/att: E. L. Allred - RC
K. L. Brady
H. T. Conner, Jr.
C. E. Harmon
M. L. Jones

L. W. Long
D. Milan
R. W. Storr
S. W. Ver
File - LF

APPROVAL FOR RELEASE

Document # _____ Date 4/17/91

Title/Subject Unnumbered

Site/Subject Ltr. to LE Hall to MM Heiskell, "K-25

Site/Subject Corrective Action Plan for Surveillance

Site/Subject of Environmental Incident Reporting

Site/Subject Approval for unrestricted release of this document is authorized by the Oak

Site/Subject Ridge K-25 Site Classification and Information Control Office, Martin

Site/Subject Marietta Energy Systems, Inc., PO Box 2003, Oak Ridge, TN 37831-7307.

Site/Subject K-25 Classification & Information Control Officer

Signature [Signature] Date 15/93

SITE OFFICE
NO. 901308
CODE 5482

Department of Energy (DOE)
Environmental Incident Reporting (EIR) Surveillance
November 7 - 8, 1990

Corrective Action Plan

Finding:

EPIR-901108-A: Environmental incidents are not being classified consistent with DOE Order 5000.3A (Priority II) (DOE 5000.3A).

Supporting Information: Incident numbers K25-90-112 and K25-90-158, both relating to receipt of notices of violation for Resource Conservation and Recovery Act violations, were classified as an "off normal" event. DOE 5000.3A, Attachment I, Page II item E (a), requires that such events be classified as "unusual occurrences." Similarly, event K25-90-142 of October 19, 1990, relating to receipt of a Notice of Violation for Toxic Substance Control Act violations, was not classified as an unusual occurrence. Event K25-90-168 reported on November 4, 1990, relating to a National Pollutant Discharge Elimination System (NPDES) violation, was not classified as an unusual occurrence after protracted discussion. DOE 5000.3A, Attachment I, Page 10, B (b), requires that all releases which violate permit requirements be classified as unusual occurrences.

Corrective Action:

The occurrences listed were categorized with full concurrence of the K-25 DOE Site Manager. The K-25 Site was still under a learning curve and striving to provide consistency in occurrence categorization. An index to prior occurrences is now maintained to aid in consistent categorization of future occurrences. It is the intent of the K-25 Site plant shift superintendent's (PSS) office to fully comply with DOE Order 5000.3A. The PSS office will continue to review and apply the 5000.3A order as consistently as possible. This finding is considered closed.

Finding:

EPIR-901108-B: Unusual occurrence K25-90-168 of November 4, 1990, a fish kill event, was not reported within two hours. (Priority II) (DOE 5000.3A) and DOE 5484.1, Chapter I,1.(n))

Supporting Information: Event K25-90-168 was reported over four hours after it occurred. It is very important that fish kill events be reported as soon as possible so that state officials can take appropriate response actions.

Corrective Action:

The shift superintendent on duty was continuously involved in locating and stopping the source problem of the fish kill. This action extended beyond the two-hour reporting period but resulted in stopping the pollutant flow and, therefore, reduced the extent of the problem. The incident was categorized and reported immediately after problem remediation. The K-25 Site is now in the process of training on-scene commanders to coordinate emergencies and assist the shift superintendent in all areas of emergency preparedness. The addition of emergency preparedness

personnel will alleviate any future problems with reporting timeframes. Training for on-scene commanders, which is conducted by the Tennessee Emergency Management Agency (TEMA), will be completed by June 30, 1991.

Finding:

EPIR-901108-C: The September 6, 1990, NPDES violation was not reported pursuant to DOE Order 5000.3A. (Priority II) (DOE 5000.3A)

Supporting Information: Because of an oversight, the subject NPDES violation was not reported as an unusual occurrence.

Corrective Action:

The occurrences listed were categorized with full concurrence of the K-25 Site DOE Site Manager. The Site was still under a learning curve and striving to provide consistency in occurrence categorization. However, in this instance the PSS office failed to report this occurrence in the required timeframe. It is the intent of the K-25 Site PSS office to comply fully with DOE Order 5000.3A. The PSS office will continue to review and apply the 5000.3A order as consistently as possible. This finding is considered closed.

Finding:

EPIR-90-1108-D: The EIR Program does not have an NQA-1 based quality assurance plan. (Priority II) (DOE 5700.6B)

Supporting Information: DOE Order 5700.6B, "Quality Assurance," establishes the requirements for Quality Assurance (QA) and the NQA-1 program. The development and implementation of NQA-1 will provide assurance that incident reports are prepared and issued as required. The plan recognizes this deficiency and plans to remedy it.

Corrective Action:

The PSS office is presently preparing a QA plan that establishes the requirements for the Occurrence Reporting System for the Shift Operations Department. This document is expected to be completed May 31, 1991.

Finding:

EPIR-90-1108-E: An internal self-assessment mechanism for the EIR function has not been fully developed and implemented. (Priority II) (DOE Order 5482.1B.9d)

Supporting Information: DOE Order 5482.1B, "Environmental, Safety and Health Program," requires the contractor to conduct auditable internal appraisals at the operating level to provide an objective and independent review of the Environmental, Safety and Health functions. The internal appraisal function is an important tool that can be used to identify and correct program and facility

deficiencies. While the K-25 Site recognizes the need for this tool, an internal appraisal mechanism has not been fully developed and implemented.

Corrective Action:

An internal self-assessment is currently being carried out and will be completed by August 1, 1991.

Finding:

EPIR-90-1108-F: The K-25 Site has not performed a compliance assessment relative to the reporting to the National Response Center of non-federally permitted continuous releases of hazardous substances that exceed the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) reportable quantity limits over 24 hours. (Priority II) (40 CFR 302.6(a).

Supporting Information: At 40 CFR 302.6(a), any person in charge of a facility is required to notify the National Response Center immediately of any non-federally permitted continuous releases of hazardous substance that exceed the CERCLA reportable quantities limits over 24 hours. Headquarters DOE and the Environmental Protection Agency (EPA) have counseled the Oak Ridge Operations (ORO) to perform such compliance assessments.

Corrective Action:

The action plan for reporting to the National Response Center was submitted to the DOE by March 22, 1991. This finding is considered closed.

Finding:

EPIR-90-1108-G: The K-25 Site has not made appropriate follow-up written notifications to the Local Emergency Planning Committees (LEPCs). (Priority II) (40 CFR 355.40)

Supporting Information: The regulations at 40 CFR 355.40 require the owner or operator of a facility to immediately notify and provide a written follow-up notice to the local emergency planning committees of any area affected by the release of a reportable quantity of any CERCLA hazardous substance or any Emergency Planning and Community Right to Know Act (EPCRA) extremely hazardous substance. Since January 1, 1990, the K-25 Site has been involved with two instances (February 2 and April 20, 1990) wherein the LEPCs were verbally notified of an environmental incident. To date, the required written follow-up notifications have not been made.

Corrective Action:

This will be accomplished by the shift superintendent organization maintaining a listing of the appropriate state, county, city, and LEPC 24-hour notification points. In the event of an emergency, the site shift superintendent organization will be responsible for direct notification (verbal with hard copy follow-up) to each of the appropriate state and local officials' 24-hour notification points, in addition to the required notifications to the DOE. The means for accomplishing this process shall be documented in a shift superintendent's Standard Operating Procedure. The draft procedure

(KPSS.0, "Occurrence Notification and Reporting") is under review. The final procedure will be issued by May 30, 1991.

Finding:

EPIR-90-1108-H: The Spill Prevention Control and Countermeasures Plan (SPCCP) has not been sent to the EPA Regional Administrator and the State of Tennessee. (Priority II) (40 CFR 112.4)

Supporting Information: EPA regulations at 40 CFR 112.4 require the owner or operator of a facility that discharges harmful quantities of oil in two spills within 12 months to submit a complete copy of the SPCCP to the Regional Administrator. The K-25 Site had a discharge of oil to waters of the state on August 2, 1989, and February 2, 1990. There is no record that the SPCCP was sent to the EPA.

Corrective Action:

The SPCCP is being prepared. The SPCCP was submitted to the DOE for submittal to the EPA and the Tennessee Department of Conservation (formerly the Tennessee Department of Health and Environment) by April 4, 1991. This finding is considered closed.

Finding:

EPIR-90-1108-I: The Site has not proceduralized regulatory reporting requirements. (Priority II) (DOE Order 5700.6B)

Supporting Information: The Environmental Coordinator's office does not have a consolidated book of procedures relating to the regulatory requirements for environmental incident reporting. Incident respondents work primarily from memory and past experience.

Corrective Action:

The Environmental Management Department will prepare procedures for regulatory reporting requirements by October 1, 1991.

92

[illegible]

DEC 14 1990

[illegible]